

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-31

RECORD Attorney General Information Request to AT&T Communications of
REQUEST: New England, Inc.

DATE: January 17, 2002

- RR-AG-3
- a. Since January 2001, please state the total dollar amount of bill credits AT&T was entitled to receive from Verizon Massachusetts under the Performance Assurance Plan.
 - b. Since January 2001, please state the total dollar amount of bill credits AT&T actually received from Verizon Massachusetts under the Performance Assurance Plan.
 - c. Please state the method or procedure by which ATT and Verizon Massachusetts resolve discrepancies regarding Performance Assurance Plan payments.

Respondent: D. Waldbaum

- RESPONSE:
- a. Please see Attachment A which shows the Massachusetts PAP bill credits AT&T has so far been entitled to receive for 2001. The first column shows the aggregate dollar amount of bill credits Verizon was required to pay under the PAP. The next several columns show bill credits due to the different operating entities of AT&T. Column two shows the bill credits that the original AT&T operations entity was entitled to receive. Column three shows the bill credits TCG was entitled to receive and column four shows the bill credits ACC was entitled to receive. The bill credits shown for 2001 start with the month of April because credits are not published until a full quarter has elapsed.

Attachment A to this information request contains proprietary information and is being provided only to the Department and parties which have signed a confidentiality agreement with AT&T.

- b. The AT&T and ACC operating entities have received the entire amount of bill credits due as reported on Attachment A.

Attachment B shows the dollar amount of bill credits the TCG operating entity has received thus far for 2001. As demonstrated by a

RESPONSE:
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operating entity has received thus far for 2001. As demonstrated by a comparison of the TCG figures in Attachment A and the TCG figures in Attachment B, the figures are not equivalent. Because the Verizon invoices do not indicate the month for which a PAP credit is given, ATT cannot confirm that TCG has received all PAP bill credits from Verizon to which TCG is entitled under the PAP. AT&T will attempt to resolve the discrepancy with Verizon.

Attachment B to this information request contains proprietary information and is being provided only to the Department and parties which have signed a confidentiality agreement with AT&T.

- c. If AT&T's Access Billing notes a discrepancy between the bill credit due and the bill credit received, AT&T first seeks to resolve the discrepancy itself. If unable to do so, AT&T contacts the Verizon Account Team to research and resolve the discrepancy. To date, AT&T has not yet referred discrepancies to the Verizon Account Team. If the above identified discrepancies cannot be resolved by internal investigations, AT&T will refer them to the Verizon Account Team.

AT&T has not yet instituted a process for validating the scoring or calculations that Verizon computes each month under the Massachusetts PAP.

RESPONSE:
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